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March 24, 2025

**VIA ECF**

Honorable Sidney H. Stein  
U.S. District Judge, Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**Re: United States v. Robert Menendez, et al., Case No. 1:23-cr-00490-SHS**

Dear Judge Stein:

As the Court is aware, this Firm represents Defendant Wael Hana in the above-captioned matter. I write to advise the Court, by way of an update to the letter submitted last night that, in response to that letter, the Government emailed us today and advised that it understands that Mr. Hana has been designated by the Bureau of Prisons ("BOP") to the Federal Correctional Institution in Minersville, PA (FCI Schuylkill). Consistent with my letter of March 23, 2025, neither Mr. Hana nor I have received any notice from the BOP as to the details of his designation or even confirming that he has been designated. Indeed, we contacted Mr. Hana's probation officer, who advised that he is similarly unaware of Mr. Hana's designation, but he is following up with BOP, which we appreciate.

To the extent Mr. Hana is indeed designated to this facility, I note that the Schuylkill facility is located nearly three hours away from the courthouse in New York. This creates significant issues for coordinating Mr. Hana's potential testimony and preparation therefore in the ongoing trial of Nadine Menendez. In any event, for that reason, and those previously submitted (including so that, if the Court denies his motion for bail pending appeal, he has the opportunity to bring an appropriate application to the Second Circuit), Mr. Hana here renews his request for a brief adjournment of his surrender date for 45 days from April 4, 2025 to May 19, 2025.

Of course, if Your Honor has any questions or concerns with regard to this request, please do not hesitate to call me. Thank you, as always, for your kind consideration of this matter.

Respectfully submitted,

s/ Lawrence S. Lustberg  
Lawrence S. Lustberg